



Privacy Policy

1. Open and transparent management of personal information

Your privacy is important to Insurance Australia Limited trading as WFI (WFI, we, us, our). We are committed to ensuring that information we hold about you is held securely and that your confidentiality is protected.

We are bound by the Australian Privacy Principles (APPs) of the *Privacy Act 1988* (Cth). We are committed to ensuring that all our business dealings comply with the APPs, and acknowledge the importance of keeping personal details for individuals confidential and secure.

To this extent, this privacy policy aims to explain the application of the APPs to the particular business of WFI. Consequently, this privacy policy should be read in conjunction with the APPs. To the extent that there is any direct inconsistency between the APPs and this privacy policy, the APPs will prevail. Questions about the APPs may be directed to the Office of the Australian Information Commissioner whose website details are: www.oaic.gov.au and telephone number is: 1300 363 992.

We are committed to the APPs and support:

- fair, transparent and open collection practices;
- processes that ensure personal information is accurate, complete and current;
- an individuals' rights to see, and where necessary, correct personal information about themselves; and
- limiting the use of personal information.

This privacy policy explains how we treat personal information that we hold about you. It details the type of personal information we collect, how we may use that information, to whom we permit access and how we protect that personal information.

As WFI is an Insurance Australia Group Limited (IAG) business, this Privacy Policy must be read together with the IAG Master Privacy Policy, which describes how IAG collects, holds, uses and discloses your personal information. A copy of the IAG Master Privacy Policy is available at: <https://www.iag.com.au/master-privacy-policy>. If the information in this Privacy Policy conflicts with information in the IAG Master Privacy Policy, the information in this Privacy Policy will override the IAG Master Privacy Policy.

By visiting our website, applying for, renewing or using any of our products or services, making a claim or providing us with your personal information, you agree to your personal information being collected, held, used and disclosed as set out in this Privacy Policy and the IAG Master Privacy Policy.

We may change this Privacy Policy from time to time. If we do so, we will notify you in such manner as we consider reasonably appropriate, including by making the revised version available on our website. Please review our Privacy Policy or website periodically for changes.

2. Collection of solicited personal information

We collect information which is reasonably necessary to provide our services for underwriting and administering your insurance, claims handling, market and customer satisfaction research and to develop and identify products and services that may interest you. Collection will only take place by lawful and fair means.

We collect information regarding you, other people, any risk to be insured, previous claims or losses, details of previous insurances and insurers, credit status, financial institution account details like your credit card or bank account number e.g. if the product or service is being paid for in this way or we are making a claim payment, and any matters relevant to the insurance to be provided.

We collect personal information directly or indirectly by telephone, email, facsimile, online, post, external agencies and in person from you. We may also collect personal information from another person or persons if it is unreasonable or impracticable to collect it from you.

We may seek to collect from you personal information about another person. This may happen if you apply for a product or service jointly with another person, grant third party authority to another person, or you have personal information about another person which is relevant to a claim. For example, you may have the details of a witness to an accident for which you are claiming under an insurance policy. If you provide us with information about another person, then you must:

- have their consent to do so
- tell them:
 - that you are disclosing their personal information to us, and
 - provide them with a copy of (or refer them to) this privacy policy.

If we collect information pursuant to a law, regulation, or court order then we will advise you of the law or the court order applicable.

If you fail to provide us with personal information then this insurance may not meet your needs. If you fail to provide information further to any duty of disclosure you have to us, then there may be no cover or a reduced cover for any claim made and in some cases the policy may also be avoided.

At the time of collection or as soon as practicable thereafter we will notify you or make sure you are aware of our identity, contact details, the purposes for which we collect the information, the consequences of not providing the information, how you can access and correct the information, that we will disclose the information overseas and the countries we will so disclose to.

Regardless of whom we collect your personal information from, we will be fair and open and we will not make any unreasonably intrusive enquiries. You should be particularly aware that we may consider it necessary to arrange for investigators to collect your personal information in relation to a service or product we have provided to you.

When entering an insurance contract, you owe a duty of utmost good faith to the insurer, in this case WFI. This is imposed by the *Insurance Contracts Act 1984* (Cth).

3. Use and disclosure of solicited personal information

We use and disclose your personal information for the purposes of providing insurance, administration of your insurance policy, claims handling and dispute resolution, facilitating our ordinary business operations (including general business reporting, modelling and analysis and managing our IT infrastructures, databases, websites and for statistical and maintenance purposes), quality assurance, audit and training purposes, improving our customer service and business processes and to better understand customer needs (including conducting research and analytics) and other related purposes. In addition, we may use and disclose personal information where we are required to or where we are permitted to by law (for example, anti-money laundering, sanctions and anti-slavery requirements).

We may disclose your personal information to Insurance Australia Group Limited and its related entities, and a range of other parties including our agents, our business alliance partners, service providers (whether in Australia or overseas), authorised representatives, referrers, other insurance providers, reinsurers, mailing houses and document service providers, financial institutions, auditors, insurance and claim reference agencies, recovery agents, credit agencies and credit providers, lawyers, accountants, loss assessors and adjusters, financial or investigative service providers, internal dispute resolution officers and dispute resolution providers such as the Australian Financial Complaints Authority, and any joint insured on your insurance policy, any other person listed on your insurance policy (for example, a nominated driver), another party involved in a claim (for example to recover monies on a claim you have made), or anyone else if they contact us with your authority.

Where we, our agents or related entities disclose your personal information to any of these third parties, they will only be authorised by us to use that information for the specific purpose(s) for which the information was provided to them. Our service providers may have their own privacy policy that contains information about their privacy practices and how you can access any personal information they hold about you, seek correction of it or make a complaint about a breach of the *Privacy Act 1988* (Cth).

Marketing

We also collect your information so that we and our related entities and business alliance partners can offer you services and products that we believe may be of interest to you. You can opt out of receiving marketing communications by contacting us or simply follow the unsubscribe instructions in the relevant communication.

You can change your mind at any time. If you decide to 'opt back in' just let us know.

Our contact details are at the end of this Privacy Policy under 'Further Information'.

4. Disclosure to overseas recipients

We may disclose your personal information to a small number of our service providers who are located outside of Australia. Those recipients are likely to be located in New Zealand, Fiji, India, Singapore, Malaysia, South Africa, Germany, the United Kingdom, the Netherlands, Republic of Ireland, the United States of America, Israel, the Philippines and Vietnam.

If we do this, we will do all we can to ensure there are arrangements in place to protect your personal information.

5. Data quality and security

We will take such steps as are reasonable in the circumstances to ensure the personal information we collect is accurate, up to date, complete and protected from unauthorised access, misuse, modification, interference or loss.

Your information is stored only in secured premises and on protected electronic databases. The databases are password and access-level protected. Access to personal information is only provided to those staff requiring it to carry on one of our functions or activities.

6. Access and correction

You can seek access to your personal information by contacting us. You can require us to correct the personal information if it is inaccurate, incomplete or out of date. We will respond to any such request within a reasonable time. We will provide you with access within a reasonable time in the manner requested, unless we are entitled to refuse to provide access. If we decline to provide you with access we will provide you with the reasons for our refusal and how you may access our internal dispute resolution (IDR) process.

If we correct information we will inform you. If we refuse to amend information we will provide you with our reasons for the refusal and details of how to access our IDR process.

7. Identifiers

We will use our own identifiers and not those assigned by the government unless we are required to do so, or the APPs or another law permits us to do so.

8. Anonymity and pseudonymity

You have the option of not identifying yourself or using a pseudonym provided it is not impracticable for us to deal with you on this basis.

However, it will generally be impractical for you to deal with us anonymously or under a pseudonym, should you wish to enter into a contract of insurance with us. This is because your identity is a relevant factor in relation to the risk of insurance. It is material to our decision of whether or not to insure you and if so on what terms and premium.

9. Complaints

We will always do our best to provide you the highest level of service but if you are not happy or have a complaint or dispute, here is what you can do.

If you experience a problem or have a complaint regarding our handling of your personal information, let us know so we can help.

Call us on 1300 934 934 or go to our website for more information on how to contact us: www.wfi.com.au

If we are not able to resolve your complaint when you contact us or if you would prefer not to contact the people who initially handled your complaint, the next step of our complaint and

dispute resolution process is to contact our Customer Relations team using the contact details below:

Free Call: 1800 045 517

Email: Customer.Relations@iag.com.au

Customer Relations will contact you if they require additional information or have reached a decision relating to your complaint. Customer Relations will advise you of the progress of your complaint and the time frame for a decision in relation to your complaint.

We expect our procedures will address your complaint in a fair and prompt manner.

If you are unhappy with the decision made by Customer Relations, the next step is that you may wish to seek an external review of the decision by raising your complaint with the Australian Financial Complaints Authority (AFCA).

You have a right in certain circumstances to have your privacy complaint determined by AFCA. AFCA can determine a complaint about privacy where the complaint forms part of a wider dispute between you and us or when the privacy complaint relates to or arises from the collection of a debt.

AFCA is an independent dispute resolution body that is recognised as an external dispute resolution (EDR) scheme under the *Privacy Act 1988* (Cth) by the OAIC to handle particular privacy-related complaints and is an approved EDR scheme by the Australian Securities and Investments Commission (ASIC). We're bound by AFCA determinations, provided the dispute falls within AFCA Terms of Reference.

You have two years from the date of our letter outlining our final decision to make an application to AFCA for a determination.

You can access AFCA dispute resolution services by contacting them at:

The Australian Financial Complaints Authority

Website: www.afca.org.au

Email: info@afca.org.au

Phone: 1800 931 678 (free call)

Mail: GPO Box 3 Melbourne Victoria 3001.

If you are unhappy with AFCA's determination in relation to your complaint, or if AFCA is unable to hear your complaint, the next step is that you may wish to raise your complaint with the OAIC.

The OAIC is an independent government agency with primary functions that relate to privacy, freedom of information and government information policy. The OAIC's responsibilities include conducting investigations, reviewing decisions, handling complaints, and providing guidance and advice. The OAIC will act as an impartial third party when addressing your complaint. The OAIC will investigate your complaint, and where appropriate, make a determination about your complaint, provided it is covered by the *Privacy Act 1988* (Cth).

The contact details for the OAIC are:

Website: www.oaic.gov.au

Email: enquiries@oaic.gov.au

Phone: 1300 363 992

Mail: Office of the Australian Information Commissioner
GPO Box 5218 Sydney NSW 2001

Call us on 1300 934 934 or go to our website for more information on our complaint and dispute resolution process or how to contact us: www.wfi.com.au.

10. Further information

If you would like more details about our privacy policy, would like to seek access to or correct your personal information, or opt out of receiving materials we send, please email us at privacy@wfi.com.au, call us on 1300 934 934 or write to us at:

PO Box 16213

Collins Street West VIC 8007

You can also view a copy of our current privacy policy on our website at www.wfi.com.au.